

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

ROCHE DIABETES CARE, LTD.,

Defendant.

Lead Case No. 2:23-cv-00585-JRG-RSP

**Consolidated Case No. 2:24-cv-00046-
JRG-RSP**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

**WONDERSHARE TECHNOLOGY
GROUP CO LTD.,**

Defendant.

DECLARATION OF COLIN R. JENSEN

I, Colin Jensen, declare as follows:

1. I work at the law firm of Garteiser Honea, PLLC, based in Tyler, Texas.

Garteiser Honea represents Display Technologies, LLC (“Display Technologies”) in this lawsuit.

I have personal knowledge of the information contained in this declaration and can testify to the truth of these statements.

2. On January 25, 2024, Display Technologies filed its initial complaint against the Wondershare Technology Group Co. Ltd. (“Wondershare”) at Dkt 1.

3. On January 26, 2024, the Clerk issued a summons (Dkt. 3).

4. On January 26, 2024, I sent the summons out for service. On January 29, 2024,

service was executed at Corporation Service Company in Austin, TX. This executed service was filed on February 12, 2024 (Dkt. 4). (This service was later withdrawn as served-in-error at Docket 8.)

5. On February 20, 2024, Darlene Fae Ghavimi emailed our firm to discuss these filings, then appeared for Wondershare (Dkt. 5) and petitioned the Court, unopposed, for a 30-Day Extension of Time to Answer (Dkt. 6) until March 21, 2024.

6. Thirty (30) days later, on March 21, 2024, Wondershare filed its Motion to Dismiss for Insufficient Service (Dkt. 7), referencing the complaint and saying they had not sufficiently been made aware of it.

7. This Motion to Dismiss included as Exhibit A, a Declaration from Meifeng Li, Senior (in-house) Counsel at Wondershare Technology Group Co. Ltd., referencing the complaint and saying she had not sufficiently been made aware of it. Even though Wondershare had counsel that had made an appearance.

8. After emails and attempted calls with Wondershare's counsel, and pursuant to their motion to dismiss, I personally sent service out again on March 22 to Wondershare via the Texas Secretary of State. It was served on March 25 (Dkt. 8).

9. Upon agreement with Wondershare's counsel, proof of service at the Secretary of State was filed on April 4, along with a Motion to Withdraw the earlier summons filed (Dkt. 9).

10. On April 15, 2024, in response to our suggestion of a waiver of process, Ms. Ghavimi stated "We intend to challenge Display Technologies' service on the Texas Secretary of State as insufficient. Right now, we already have [this] motion pending. But given your withdrawal of the first return of service, the facts in that motion are moot[...] In terms of timing, I would anticipate filing the Amended Motion before the end of [this] week."

11. Wondershare still insisting service was insufficient despite their emails discussing the case, their appearance in this case back in February, and their filing of three entries on the docket, I personally overnighted on April 18, 2024 a copy of the complaint and summons to Wondershare.

12. In summary, I attest to personal knowledge that Wondershare has demonstrated by phone, by email, and by multiple filings with the court, both through appeared counsel and in-house corporate counsel, that they received service sufficient for the Court to accept it as sufficient.

I declare, on April 18, 2024, in Smith County, Texas and under penalty of perjury under the laws of the United States and Texas, that the statements made in this declaration are true and correct.

Dated: April 18, 2024

/s/ Colin R. Jensen
Colin R. Jensen